

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DOMINION CITRUS, LTD.,
et al.,

Plaintiffs

v.

M/V BADRINATH, her engines,
machinery, tackle, apparel, etc.,
et al.,

Defendants

CIVIL ACTION
1:07-cv-00050-JJF

NOTICE OF MOTION

Please take Notice that on June 6, 2008 at 2:00pm, or as soon thereafter as counsel may be heard, that Defendant Ashwater Navigation Co., Ltd., shall move the United States District Court for the District of Delaware, the Honorable Joseph J. Farnan, Jr., for an Order compelling Plaintiffs' response to Defendant's Request for Production of Documents.

PALMER BIEZUP & HENDERSON LLP

By: /s/ Michael B. McCauley

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and M/V BADRINATH

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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that service of a true and correct copy of the foregoing Notice of Motion was made to the below-listed counsel via United States First-Class Mail, postage prepaid, as follows:

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I certify under penalty of perjury that the foregoing is true and correct.

Executed on May 1, 2008.

PALMER BIEZUP & HENDERSON LLP

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